

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

Martin J. Walsh
Secretary of Labor
United States Department of Labor,

Petitioner,

v.

Stout Risius Ross, LLC

Respondent.

No. 2-21-mc-00055-MMB

DECLARATION OF LARS C. GOLUMBIC

I, Lars C. Golumbic, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney with the law firm Groom Law Group, Chartered, and counsel of record for Stout Risius Ross, LLC (“Stout”) in the above-captioned action.

2. I provide this declaration in support of Stout’s October 15, 2021, Status Report. I state these facts based on personal knowledge.

3. The reports that Stout produced to the Department in response to Requests 1 and 2 include analyses of pet care providers in the Southeast and manufacturing companies in the Midwest; companies valued around \$20 million to those valued for hundreds of millions of dollars; and various transaction structures, including purchases of 100% interests and partial interests, and fully- and partially-seller financed deals (to name just a few examples). In all, the 178 reports cover nearly 80 different businesses and their respective benefits plans that participated in these transactions.

4. Attached hereto are true and correct copies of the following documents:

a. Exhibit J – August 20, 2021, letter from L. Golumbic to R. Buchanan and P. Dahlin, transmitting Stout’s first production of documents.

b. Exhibit K – September 1, 2021, Email from P. Dahlin to L. Golumbic regarding Stout’s forthcoming production.

c. Exhibit L – September 3, 2021, letter from L. Golumbic to R. Buchanan and P. Dahlin, transmitting Stout’s second production of documents.

d. Exhibit M – October 12, 2021, Email from A. Salek-Raham to R. Buchanan and P. Dahlin regarding the parties’ September 30 and October 12 teleconferences.

5. I previously submitted a declaration, (Dkt. 4-1), in support of Stout’s Response to the Department’s Petition to Enforce the Subpoena, (Dkt. 4), and Stout’s Motion to Modify the Subpoena, (Dkt. 5). The exhibits referenced in this declaration are numbered as a continuation of the exhibit numbering in my prior declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed October 15, 2021, in Washington, D.C.



Lars C. Golumbic